

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

In re:

Hyatt Realty LLC,

Debtor.

CHAPTER 11

CASE NO. 15-43991

AFFIDAVIT

STATE OF NEW YORK       )  
                                      ) SS:  
COUNTY OF KINGS        )

**Vernon Blake Hyatt, aka Blake Hyatt**, being duly sworn, deposes and says:

1. I, together with my mother Lea Hyatt are the members of the Debtor. We hold equal shares. I am the operating member of Hyatt Realty, LLC, a New York limited liability company and now Debtor-in-Possession.

2. I submit the following information pursuant to Local Rule 1007-3 and in connection with the Debtor's voluntary petition for relief under chapter 11 of Title 11 of the United States Code (the "Bankruptcy Code") filed herein.

3. The principal office of the Debtor is located in this district at 18 Butler Street, Brooklyn, New York.

4. The Debtor's taxpayer identification number is 20-3488731.

5. No official or unofficial committee of creditors of the Debtor has been organized as of this date.

6. No property of the Debtor is in the possession or custody of any custodian,

public officer, receiver, trustee, assignee of rents, or secured creditor or agent for any such person except court appointed Receiver.

7. The Debtor's principal books and records are located at 18 Butler Street, Brooklyn, New York.

8. A listing of the Debtor's twenty (20) largest unsecured creditors, excluding insiders, is attached to the Debtor's petition.

9. The Debtor operates its business from 18 Butler Street, Brooklyn, New York.

10. No stocks, bonds, debentures, or other securities of the Debtor have been publicly issued.

11. The Debtor does not have any assets located outside the territorial limits of the United States.

12. The Debtor entered into a construction contract with Shawn Patrick Inc. ("Shawn") in 2014. The contractor performed some work at the premises and the Debtor paid for the work. However, the Debtor has now determined that the work performed by Shawn was inferior and not in the required workman-like manner.

13. The Debtor, together with its members, were induced to sign a confession of judgment by Shawn. Shawn had demanded the confession of judgment to insure Shawn would be paid on completion of the required work.

14. Shawn breached its construction agreement. Shawn recently filed the confession of judgment when it realized the Debtor would not pay for services not performed by Shawn.

15. The Debtor intends to commence and adversary proceeding to void the confession of judgment and sue Shawn for damages.

16. The Debtor is negotiating a contract with a very reputable construction company to complete the building. Once renovated, the building will have 3 newly renovated rental apartments. The significant income stream will enable the Debtor to reorganize.

Hyatt Realty LLC

/s/  
Vernon Blake Hyatt, operating member

Sworn to before me this  
28<sup>th</sup> day of August, 2015

/s/  
NOTARY PUBLIC